

## Trade Survey Recommendations

### Visibility

1. **The COAC recommends that CBP and PGAs partner with the trade community to target PGA requirements training and promote visibility of holds in ACE/ACS.** We recognize and encourage the implementation of the One US Government at the Border Single Window approach, coupled with the PGA Message Set will provide greater visibility to the trade community as to the reasons for the holds. We encourage the Partner Government Agencies to become early adopters of PGA Message Set, allowing for early submission of information so the PGA may make earlier risk assessment decisions on admissibility of cargo.
2. **The COAC recommends that CBP task COAC to define delays and holds and ensure a process exists for those types that require data capture.**
3. Once delays and holds are defined in accordance with 2013 operations, **COAC recommends that CBP develop national import/export port metrics** as a method a) to understand the complexities associated with goods release by mode of transport and region and b) to achieve standardization of best operating practices across ports.
4. **The COAC recommends sharing the results with the Centers of Excellence and Expertise via the Industry Working Groups to achieve industry-specific best practices.**
5. With strategic efforts such as the implementation of CEE's, streamlining and integration of PGAs via trade processes, and the National Export Initiative and Export Control Reform, it is important for CBP to continue to collaborate with COAC to seek ways to measure and improve trade processes and reduce freight dwell. **We recommend CBP provide the trade with web-based metrics regarding export and import delays and holds on a 1USG basis.**
6. **We recommend the continuation of the Center Industry Working Group metric sharing to generate meaningful bi-directional dialogue that will generate successes in meeting the objectives of both CBP and the trade.**

### Knowledge Sharing

7. **The COAC recommends that CBP share the survey information with the Partner Government Agencies (PGAs) to achieve a better understanding by the PGAs of the impact of cargo holds, detention and dwell times on the international supply chain.** Establishing integrated policies serves to remove port variation, regulatory misunderstandings and trade inefficiency, a key contributor to cost.
8. **The COAC recommends that CBP share the results of the 2013 AD/CVD questions with relevant government entities when discussing issues related to the retrospective system of AD/CVD enforcement and collection.** The 12th COAC made a formal recommendation based on several reasons that the AD/CVD system be changed to a prospective system similar to those utilized by all global trading partners. The feedback in this survey indicates that the larger trade community strongly supports this earlier COAC recommendation and would favor a prospective system. As this subject is often a topic of discussion in various forums in which CBP participates, the COAC recommends that CBP communicate this feedback in the appropriate forums.
9. When shipments are stopped or paused at the ports, the results tell us the respondents are favorable to dealing with CBP, as compared to the PGA (in general). **COAC recommends that CBP champion a knowledge sharing exercise between PGA's and CBP specifically around holds / freight stops to align best practices and identify process improvements.** Accomplishing this review in conjunction with the Centers will ensure positive benefits for the trade. We anticipate that the metrics will reveal the positive impact to the trade in the areas of decreased freight dwell, improved targeting, and increased customer service.

### Integrated Customer Service Model

10. **We recommend CBP advocate for an integrated customer service model with the PGA's.** Synthesizing the current customer service design of CBP and PGAs will benefit both trade and security. Additionally, using the

Centers to aid in the integration of a service model is most beneficial to impact processing times and freight dwell.

Annual Trade Efficiency Survey

- 11. We recommend the continuation of an annual COAC survey to assist in prioritization, measure success, obtain satisfaction feedback, and begin establishing trends.**